

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

|                          |   |                  |
|--------------------------|---|------------------|
| _____                    | ) |                  |
|                          | ) |                  |
| UNITED STATES OF AMERICA | ) |                  |
|                          | ) |                  |
| v.                       | ) | No. 16-10094-LTS |
|                          | ) |                  |
| ROSS MCLELLAN,           | ) |                  |
| Defendant                | ) |                  |
| _____                    | ) |                  |

**MOTION FOR LEAVE TO SUPPLEMENT PRIOR MOTION**

Now comes the defendant Ross McLellan, by and through undersigned counsel, and hereby respectfully moves this Honorable Court for leave to file a supplement to his prior Motion for Relief relating to the U.S.-Ireland Mutual Legal Assistance Treaty (“MLAT”), Dkt. 276. As grounds and reasons therefore, Mr. McLellan states that, due to developments since the filing of his prior motion, his arguments relating to the U.S.-Ireland MLAT now apply equally to his efforts to obtain evidence from seven entities located in the United Kingdom.

**WHEREFORE**, the defendant respectfully requests that the instant motion be allowed.

**Local Rule 7.1(a)(2) Certification**

The undersigned counsel conferred with counsel for the Government and the Government, by and through Stephen E. Frank, does not oppose this request.

Respectfully submitted,

Ross McLellan  
By his Attorney,

**/s/ Martin G. Weinberg**  
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Dated: March 19, 2018

**CERTIFICATE OF SERVICE**

I, Martin G. Weinberg, hereby certify that on this date, March 19, 2018, a copy of the foregoing document has been served via Electronic Court Filing system on all registered participants.

**/s/ Martin G. Weinberg**  
Martin G. Weinberg